

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

IN RE TYCO INTERNATIONAL, LTD., SECURITIES LITIGATION	02-MDL-1335-PB SECURITIES ACTION
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**ASSENTED-TO MOTION OF LEAD PLAINTIFFS (1) TO EXTEND TIME
AND (2) TO COMBINE IN A SINGLE MEMORANDUM OF LAW LEAD
PLAINTIFFS' RESPONSE TO TYCO'S CROSS MOTION FOR A
PROTECTIVE ORDER AND REPLY MEMORANDUM IN FURTHER
SUPPORT OF LEAD PLAINTIFFS' MOTION FOR A PROTECTIVE
ORDER PREVENTING TYCO INTERNATIONAL, LTD. FROM
CHARGING AN UNJUSTIFIED AND EXORBITANT SUM FOR ITS
DOCUMENT PRODUCTION**

With Tyco's assent, and pursuant to Local Rule 7.2(a), Lead Plaintiffs Plumbers and Pipefitters National Pension Fund, United Association General Officers Pension Plan, United Association Office Employees Pension Plan and United Association Local Union Officers & Employees Pension Fund, Teachers' Retirement System of Louisiana, Louisiana State Employees' Retirement System, and Voyager Asset Management (collectively "Lead Plaintiffs") respectfully move that the deadline to file (1) Lead Plaintiffs' Opposition to Tyco's cross motion for a protective order (Document 710); (2) Lead Plaintiffs' motion for leave to file a Reply Memorandum Of Law In Further Support Of Lead Plaintiffs' Motion For A Protective Order Preventing Tyco International, Ltd. From Charging An Unjustified and Exorbitant Sum For Its Document Production, dated April 4, 2006 (Document 682) (the "Reply Memorandum"); and (3) Lead Plaintiffs' Reply Memorandum be extended until **Wednesday May 24, 2006**. Tyco does not object to Lead Plaintiffs' filing of the Reply Memorandum.

In addition, with Tyco's assent, and pursuant to Local Rules 7.1(a)(3) and 7.1(e), Lead Plaintiffs respectfully move that their opposition to Tyco's cross motion for a protective order and their Reply Memorandum be combined in one filing not to exceed 25 pages.

Lead Plaintiffs further state that the granting of this motion will not result in the continuance of any hearing, conference, or trial.

WHEREFORE, Lead Plaintiffs respectfully request the following relief:

A. An Order permitting up to and including **Wednesday May 24, 2006** the filing of: (1) Lead Plaintiffs' Opposition to Tyco's cross motion for a protective order (Document 710); (2) Lead Plaintiffs' motion for leave to file a reply memorandum of law in further support of Lead Plaintiffs' Motion For A Protective Order Preventing Tyco International, Ltd. From Charging An Unjustified and Exorbitant Sum For Its Document Production, dated April 4, 2006 (Document 682) (the "Reply Memorandum"); and (3) Lead Plaintiffs' Reply Memorandum;

B. An Order permitting Lead Plaintiffs to combine their opposition to Tyco's cross motion for a protective order and Lead Plaintiffs' Reply Memorandum in one filing not to exceed 25 pages. and

C. An Order granting such other relief as is just.

Dated: May 11, 2006

Respectfully submitted,

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

CERTIFICATE OF SERVICE (ECF)

The undersigned, Co-Lead Counsel for the Securities Plaintiffs, hereby certifies that on this date, a copy of the foregoing: **ASSENTED-TO MOTION OF LEAD PLAINTIFFS (1) TO EXTEND TIME AND (2) TO COMBINE IN A SINGLE MEMORANDUM OF LAW LEAD PLAINTIFFS' RESPONSE TO TYCO'S CROSS MOTION FOR A PROTECTIVE ORDER AND REPLY MEMORANDUM IN FURTHER SUPPORT OF LEAD PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER PREVENTING TYCO INTERNATIONAL, LTD. FROM CHARGING AN UNJUSTIFIED AND EXORBITANT SUM FOR ITS DOCUMENT PRODUCTION** was electronically filed with the Clerk of the Court using the USDC ECF system, and thus served on all counsel identified below and in the resulting Notice of Electronic Filing.

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